

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 2:24-cr-00124

LORI BUTTS,

Defendant.

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF
DEADLINE TO FILE MOTIONS**

Defendant Lori Butts, by her counsel, Nicole M. Masnica of Gimbel, Reilly, Guerin & Brown LLP, hereby moves the Court for a modification of the text only order entered on January 15, 2025, to file pre-trial motions, extending the defendant's deadline by one week to February 28, 2025.

An indictment charging Ms. Butts with eight counts of Health Care Fraud and eight counts of Wire Fraud, was issued in this case on June 25, 2024. (Doc. 1). The Court made a speedy trial finding at a counsel-only scheduling conference held on July 30, 2024, which excluded the 60 days between that hearing and the next, which was held on September 24, 2024. (Doc. 7). At the November 22, 2024, counsel-only scheduling conference, the parties appeared and conferred regarding the deadlines for motions, and the Court adopted the following scheduling order: defense motions were to be due January 17, 2025, the Government's response due by January 31, 2025, and defense reply briefs due by February 7, 2025. (Doc 10).

Based upon the unopposed motion of undersigned counsel (Doc 13), the scheduling order was modified on February 10, 2025 in a text-only order to reflect that motions are to be filed by February 21, 2025, responses by March 3, 2025 and replies by March 10, 2025. (14).

The parties have been working together to confer regarding the privilege log and require additional time to do so. Undersigned counsel completed a civil jury trial in Waukesha County and has been in trial preparations for back-to-back criminal jury trials beginning February 24, 2025. Undersigned counsel has been unable to dedicate the time needed to identify these documents within the allotted timeframe. Additionally, the associate attorney assisting undersigned counsel in this matter welcomed a new baby last week and has been unavailable.

In advance of this motion, undersigned counsel contacted Assistant United States Attorney Carter Stewart to discuss an extension. AUSA Stewart indicated that the Government does not object this motion.

For these reasons, undersigned counsel believes there is good cause to grant the motion for modification of the established scheduling order to the date listed above.

Dated this 21st day of February, 2025.

Respectfully submitted,

GIMBEL, REILLY, GUERIN & BROWN LLP

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